

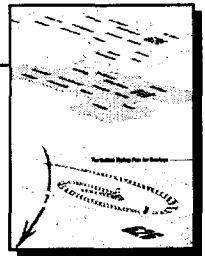
# The Unified Dialing Plan for Overlays

7/12/97

Secretary William Caton  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, D. C. 20554

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Dear Secretary Caton,  
Please add this submission to the public record in **CC Docket 96-98**, concerning the Commission's reconsideration of mandatory 10 digit dialing in overlay situations.

It is important to recognize that solutions may exist which don't require dialing 10 digits in an overlay, but still provide dialing parity. The Unified Dialing Plan for Overlays describes a system which provides abbreviated dialing across a 'related group' of multiple area codes. This plan evolved from an effort to find a technically workable solution for area code relief which would not present hardships to local business and the public.

Simply by dialing the '7 digit phone number' + a '1 digit suffix' (which represents the destination area code), the call will be routed to the specified phone number in the intended area code. With this 8 digit *Unified* dialing system, the overlay grouping would appear to function like one big *Super Area Code* capable of supporting up to 10 times as many phone numbers as a single area code.

The plan is also non-disruptive to dialing patterns in the original established area code. From any area code in the overlay group, if only 7 digits are dialed, after a short timing delay the call will be routed to the original established area code of the group. This mechanism ensures that no one will be put in jeopardy by a change to their local dialing plan and allows existing auto dialers to complete calls without reprogramming. In other words, old 7 digit phone numbers can still complete calls to the original area code by invoking 'timing'. This does not violate dialing parity since it is actually more expeditious to dial '7 digits + X' (rather than '7 digits + timing') for all calls.

Because this system is merely an alternate way of accessing the industry standard 10 digit system, it will not interfere with the normal functioning of the telephone network.

Naturally all calls directed outside of the geographic overlay area would still be 10 digit and all calls from outside the geographic overlay area into the overlay area would also be 10 digit (the same as it has always been).

With this system:

- customers get to keep their existing area codes and phone numbers.
- all dialing patterns to established phone numbers are preserved.
- relief is provided without disruption, expense, confusion or inconvenience.
- the 'Unified' model eliminates the competitive disadvantages normally associated with a new 'overlaid' area code.

The enhancements offered by this 'Unified' plan address the true objections that the public, the FCC and many PUCs have voiced regarding overlays, and should be seriously considered as an alternative to mandatory 10 digit dialing in an overlay.

Sincerely,

Gilbert Yablon

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